

Big Picture Talking Points on EPA's Path Forward Letter to the Navy

- On April 11th, we sent a letter to the Navy on our proposed path forward to start field work. Specifically, we outlined a phased approach to complete the long-term protectiveness evaluation in the Five-Year Review report and to finalize the Parcel G Work Plan. Phasing the work allows the Navy to strategically move forward with field rework, while providing opportunity for further analysis and discussion among the regulatory agencies in a publicly transparent manner.
- On April 15th, we met with the Navy to discuss our proposed path forward. We seemed to agree on many points. We look forward to hearing more from the Navy about how they will choose to move forward.
- The Navy is doing its Five-Year Review, as required by Superfund law. This important process will assess whether current remedies and remedial goals documented in the Records of Decision (RODs) protect human health and the environment now and in the future.
 - **EPA's PRG Calculator** help with this protectiveness determination in the Five-Year Review. Specifically, the PRG Calculator should be used to evaluate exposure to onsite soil and existing buildings. **We have not yet received the Navy's draft PRG Calculator assessments for the use of existing buildings in a residential scenario** which incorporate our September 21, 2018, comments.
 - The Navy has suggested they **wish to use RESRAD**, a tool maintained by the Department of Energy, in lieu of the PRG Calculator. Both tools assess risks to human health from exposure to radiation. In our two recent letters to the Navy, we explained we can work with them on their consideration of RESRAD after we consult with headquarters to ensure the use of RESRAD complies with Superfund regulations and guidance.
 - We recommend the Navy issue its draft PRG Calculator assessments for onsite soil as soon as possible. We strongly recommend this document be issued for regulatory agency and public comment. It's truly important this work proceeds with full transparency. Some members of the public have already been skeptical of the Navy's use of the PRG Calculator.
- The Five-Year Review relates to the Parcel G rework in important ways. An agreement on what levels protect human health is a crucial step to implementing field work on Parcel G (sensitivity of equipment, plus cleanup levels). If the Five-Year Review concludes that current cleanup levels are not protective *after* the Parcel G rework is complete, then the Navy may need to reperform the work.
- For the Parcel G Work Plan, our priority is to get in the field as soon as possible to reexamine the areas where Tetra Tech EC Inc conducted previous radiological work. We recommend the Navy quickly move forward with soil reference background testing outside of Parcel G (once they address comments sent in December and future minor comments to be sent by April 25th). Simultaneously, we can coordinate on the final portions of the Parcel G Work Plan to begin the radiological soil testing and cleanup, if necessary. This process would include an opportunity for public comment. Finally, the agencies can work to resolve remaining issues related to the radiological rework at existing buildings on Parcel G.

Questions for Supervisor Walton

I know we have a shared goal that that the rework must proceed with full transparency to the public. I understand you are working on two specific approaches to bring more transparency to the work.

- We understand you and Mayor Breed are working on the UCSF and UC Berkeley independent review panel. We want to ensure we are sharing the right information at the right time and ensure the project schedule can meaningfully address recommendations from such a panel. Can you help us understand the scope and timeframe of this panel?
- We also understand you are working with a subset of community members from the Hunters Point Shipyard residences. This seems like a powerful opportunity to share truthful information with residents and this is one recommendation we previously made to the Navy. Is there anything you need from EPA to help support this effort? Is the Navy providing time from their third-party technical assistance person to help?

What can EPA be doing to be more transparent and communicate the right level of information to the public?

Do you see opportunities for us to work together to better serve this community?